

LETEASHA YOUNG,
Plaintiff,
v.
VISION HOSPITALITY GROUP,
Defendant.

)
)
) Case No. _____
)
) Judge _____
)
)

Defendant hereby removes this action to this Court pursuant to 28 U.S.C. § 1441(b) and, in support thereof, states as follows:

2. This is an employment lawsuit in which the Plaintiff alleges claims under federal law – namely, Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, et. seq., and the Equal Pay Act of 1964, 29 U.S.C. § 206 (*See* Pl.’s Compl. ¶ 1).

3. Because Plaintiff asserts a federal cause of action, this litigation is a civil action of which this Court has federal question jurisdiction under 28 U.S.C. § 1331.

4. The removal of this matter is timely. 28 U.S.C. § 1446(b). The Defendant was served with this action on March 13, 2014. Defendant is removing this matter within 30 days of service.

5. All pleadings filed with the Chancery Court have been attached as an exhibit to this Notice of Removal.

WHEREFORE, Defendant removes this action from state court to this Court.

Respectfully submitted,

/s/ Jonathan O. Harris

Jonathan O. Harris, TN #021508

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Attorneys for Defendant Vision Hospitality Group

CERTIFICATE OF SERVICE

I hereby certify that on this the 9th day of April, 2014, the foregoing was filed electronically with the Clerk of the Court to be served via U.S. first class mail upon the following:

Randall D. Larramore
Paty, Rymer & Ulin, P.C.
19 Patten Parkway
Chattanooga, TN 37402

/s/ Jonathan O. Harris

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